

RM-8260

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of refiling of PROPOSAL,
as per formerly stated requirements of
the Commission, to establish a no-theory
license for all frequencies allocated to
the amateur radio service, ultimately
leading to a no-code, no-theory license;
and, to redefine under Part 97.1
the purpose of the amateur service.

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FCC MAIL ROOM

Summary

A petition filed on June 2, 1992 requesting the Commission to establish a no-code, no-theory license for all amateur radio licensees was denied on July 28, on grounds that such conditions as brought out in the petition for establishing such a license had not been shown to exist.

Whereas,

- Further to Special Service's Chief McNamara's letter of July 27, the Commission did not directly address the points made in the proposal of June 2 for a no-code, no-theory license for the amateur radio service, the Commission electing instead to re-state the points made therein on its own terms.

- The Commission's references to Sections 97.1-97.527 did not directly relate to the inadequacy of rote exams in establishing a base of technically qualified amateurs that would essentially allow them to meet the terms of Part 97.1, and would thus allow the service to retain its frequencies without fear of lost or reclaimed spectrum.

Also whereas,

The Commission did not refute that:

- Amateurs have no need to apply electrical theory in the operation or construction of his/her station.
- Private and commercial services provide emergency services to the public in times of disasters as effectively as amateur stations.
- Amateur radio is no longer promoted as a technical hobby.
- The loss of more than 100 MHz of amateur frequencies during the past decade is one indication of amateur radio's lack of worth to the Commission.
- The flaws in the Amateur Radio Spectrum Protection Act do not offer amateurs protection against encroachment of its frequency allocations.
- The no-code waiver for handicapped amateurs minimizes the ability of the Commission to reject a no-theory waiver for the handicapped, and by extension, to the general population.
- Statements made by former PRB personnel link amateurs' 1982 rejection of FCC's no-code proposal with the ultimate loss of very-high-frequency (VHF) spectrum,

sufficient evidence does in fact exist that the process of deregulation, i.e., eased requirements for amateur licenses, has compromised the Amateur Service's ability to justify their frequencies as a technical hobby based on Section Part 97.1 of the "Amateur Charter." The aforementioned evidence and documentation formerly requested by the Commission is presented herewith, as indicated in the matter of COMMENT to the Commission by the petitioner on August 24, 1992, to justify altering the current amateur licensing structure (or alternatively, restoring meaningful standards) for the Amateur Service. More specifically, the petitioner requests that the Commission:

(1) Establish a no-theory license (later graduating to a no-code, no-theory license) for all amateurs within the guidelines of a newly defined Part 97.1 that amateurs *will* be able to meet, thus enabling them to retain their frequencies, AND

(2) Declare simply, in words clearly understood, the Commission's plans for the long term future of this hobby as one that is technical or non-technical in nature, in order that amateurs be able to retain frequencies presently allocated to them under whatever terms are specifically stated by the Commission,

OR OTHERWISE:

(3) Re-establish examination standards that existed prior to November 22, 1968 (the start of ARRL/FCC's "Incentive Licensing" program), in order that amateur radio operators be able to meet the guidelines of Part 97.1, and therefore retain their presently allocated frequencies.

In this way, the service will be able to meet the requirements of a *clearly and meaningfully stated* Part 97.1, thus allowing the service to retain its allocations without further encroachment of its frequencies.

Overview

The general easing of technical requirements during the past two decades for individuals wishing to obtain an amateur radio license in the United States indicates the traditional mission of amateur radio as a technical hobby under the directives stated in Part 97.1 is no longer of major concern to the Commission. The trend to ease requirements with regard to knowledge of Morse Code in various parts of the world, notably Japan and now under investigation in England, for hf-band privileges; combined with eased requirements with exam-by-rote theory examinations in the United States and de-facto abandonment of the goals related to technical expertise in Part 97.1, indicates strong need for the Commission to reassess, and to formally redefine, the purpose and goals of the amateur service.

A 5-wpm, no-theory license for those wishing to operate in all portions of the spectrum allocated to amateurs, and the ultimate establishment of a no-code, no-theory license, will eliminate several major problems relatively new to the amateur service, the most notable ones of which are a fragmented amateur service afflicted with faction and confused as to its mission, and a growing portion of the populace who believes it is their right, on constitutional grounds, to hold an amateur license. In difficult economic times, such a license would also help to build the market for amateur radio/citizens communications equipment, meeting the desires of various Commission

personnel who have called for an Amateur Service that is "market driven." Easing of requirements in this way, and formally suspending the five directives of Part 97.1 will for a time remove the "official" justification for the frequencies amateurs now occupy. This difficulty will be overcome, however, if Part 97.1 is revised to reflect amateur radio's changing role as seen by the Commission, and it will specify the new conditions for which amateurs *can* demonstrate justification of its frequencies. By providing amateurs with a formal declaration of the Commission's desires, the Commission will also minimize the amount of upheaval between amateurs in the transition period. The formal declaration will also allow each individual to weigh, without fanfare and conflict with other amateurs, all factors in determining whether to accept the provisions of, and participate in, the new service.

Background and Recent History

The pertinent information with regard to the easing of requirements for the amateur service begins, curiously, with the establishment of the "Incentive Licensing" program initiated by the American Radio Relay League (ARRL) in 1963, enacted into legislation November 22, 1967, and implemented starting November 22, 1968. The program, highly controversial amongst amateurs at the time, was an effort by the ARRL *and the Commission* to raise technical competence in the amateur ranks in order that they strengthen the service and justify the frequencies allocated to them. Speaking at the 10th Annual Meeting of the Quarter Century Wireless Association, ARRL President Herbert Hoover Jr. stated (see QST Magazine, April 1966, p. 26):

"...about three years ago, the League recognized that if the Amateur Service was to maintain its responsibilities for technical competence, in accordance with the definitions set forth in the Communications Act, there had to be a general upgrading of the Service....It is not often, in this day and age, that a membership society will ask that its licensing requirements be upgraded, rather than downgraded. But our Board felt that if the Amateur Service as a whole was to continue to operate in the public interest, and thereby qualify for whole-hearted support by our government, then the technical competence of the service must keep pace with present-day technology..."

Fortunately, or unfortunately, the incentive licensing program never took root. A clear example can be shown in simply examining the demographics of the amateur Extra Class license. In the mid 60s, about one and a half percent of the amateur population was successful in passing the 100 question examination, of which 10 questions required the drawing of schematics for circuitry involved in oscillators, amplifiers, and so on. In the early 70s, the requirements for drawing schematics were dropped. The 100 question exam was reduced to 50 questions in the mid 70s. The nature of the questions were changed in the early 80s, as the tendency to test for knowledge of rules and regulations became apparent. By the time volunteer examining coordinators were established in the mid 80s to conduct amateur examinations, question "pools" for all questions that would appear on an exam were created. The exact questions and answers were then periodically published and made available to all those amateurs wishing to "upgrade." Not surprisingly, then, the number of Extra Class amateurs today represents an eight-fold increase to about 11 percent of the total amateur population, and many held by youngsters less than 15 years old, despite falling grades in math and science across the entire country. Similar results due to deregulation can be seen in virtually all other license classes.

During the period of 1982 to 1990, there was also a concerted move by the Commission to establish a no-code license, with the stated goal of attracting "bright young computer enthusiasts" to the amateur ranks. The effort initially failed in 1982, in large part because it was not supported by the amateur service. In 1990, however, the Commission cited "changing amateur sentiment" in establishing a no-code license for the VHF bands, later extending it to the handicapped for hf bands. (As an aside, it should be noted that the Commission failed to prove its contention of changing amateur sentiment, because no professionally conducted poll was ever carried out to confirm the Commission's belief). To summarize, the end result of the Incentive Licensing program resulted instead in an *easing* of requirements, thereby abrogating both the FCC's and the ARRL's own initial directives.

Documentation

FCC Statement Linking No-Code Proposal to Loss of Frequencies

The available evidence shows a connection between self-initiated Commission actions to introduce a no-code proposal, the aforementioned easing of requirements for prospective amateur licensees, and the loss of amateur frequencies. The proposal to create a no-code license was introduced by various personnel in the Private Radio Bureau in 1982, where it was soundly defeated by the amateur community. However, in 1984 the Commission stated that such a decision on the part of amateurs was unacceptable, when then-PRB-chief Robert Foosaner, a guest speaker at the ARRL National Convention in New York City on July 21, said at the well-attended FCC forum, and to which I was witness:

"Because (radio) amateurs have opposed the no-code license, the Commission can no longer guarantee that amateur bands in the VHF spectrum will not be in jeopardy of being lost."

Thus, in tying the acceptance of no-code with loss of operating frequencies, the Commission's policy was clearly set. In 1989, as the Commission did indeed reduce operating frequencies in the 220 MHz amateur band, the Commission cited "changing amateur sentiment" regarding the acceptance of no-code. However, such a contention was never supported by fact, since neither the Commission nor the ARRL ever initiated a scientifically conducted poll of amateur views. The available evidence connecting FCC actions to initiate a no-code license, and the loss of amateur frequencies, is therefore substantial.

Sinking Education

The Commission, in rejecting the initial no-code, no-theory license proposal of June 2, expressed doubt as to whether easing of technical requirements in amateur radio has in fact resulted in a loss of technical expertise for the typical amateur. The available evidence indicates that it has, starting with the concerns of military, industry and educational leaders more than twenty five years ago. Commenting to the Commission on the ARRL proposal for Incentive Licensing, which resulted in a **Proposal for Rulemaking by the Commission, Docket 15928**, the Commission itself cited the statement of a former Chief Signal Officer for the Army:

"During the early years of my military career (the 1930s) whenever an individual who possessed a radio amateur license came to my attention I did the utmost to have the individual assigned to communications work. His license spoke well of his trained understanding and intense interest. During the latter part of my career (the last decade or so) such as not been my feeling. The

license has generally meant 'Here is another hobbyist— maybe he has it and maybe he doesn't.' The license has lost its stature; it appears to be anybody's just for the asking..."

Further, the Commission cited the statement of the president of a leading electronics manufacturing company:

"A decade ago when a license radio amateur applied to the company for employment, mere possession of a ham ticket was sufficient guarantee that the holder was technically competent, could read a schematic, had the capability to learn, and was capable of mature growth in the industry. Many of today's leaders in the electronics field advanced along this very path. Now, although the electronics industry is in chronic shortage of trained technicians and engineers, by and large, applicants for these jobs are not coming from the ranks of the radio amateur. Possession of a radio amateur license does not now mean the holder is technically qualified in any sense. On the contrary, the Personnel Department of this Company has been continually disappointed with the quality, calibre and technical ability of holders of radio amateur licenses to such an extent that such individuals are subject to careful screening before they are considered for employment."

The Commission further cited a college engineering and technology educator:

"As a college instructor, we automatically assumed (and with good basis) that an engineering student who was also a radio amateur, would be a highly capable student willing and able to accept the loads and responsibilities of an engineering program. This idea to an even higher degree was present when the new student possessed a license of one of the more advanced classes..."

In contrast, today we in education almost prefer not to have our students come to us with amateur radio licenses. Typically, today's ham is concerned with contests and chatter and knows little or nothing of theory and construction. His approach to study is hit-or-miss or the try-this-or-that approach. He appears never to have tried to understand the basis of electronics to say nothing of his equipment itself. He has probably never wired anything more complex than a cable or two and would not consider the modification or service of even his personal receiver. He simply wouldn't know how and is not really interested in it beyond its function of reception."

A rather well known survey conducted by Vincent Biancomano in 1986 (see Appendix I) tends to confirm the concern of the military, industry and educators. In a study of 205 amateurs across all license classes, Mr. Biancomano found that less than 13 percent could correctly define the term "voltage." According to Mr. Biancomano,

"...this was a 'just for fun' exercise and was not intended to be any more than that, nor could it be from a statistical standpoint. However, although the question as asked required some thought to answer, it does initially appear to me there is a rather serious deficiency when it comes to amateurs' understanding of even the most fundamental aspects of electricity, and it should be looked into further. Unfortunately, too few are concerned enough with the educational system to do anything about it at this time."

Mr. Biancomano further states (oral communication) that it is not uncommon to encounter

"amateurs across all license classes, from Novice to Extra, who are unable to apply simple Ohm's Law."

A sampling of comments posted by packet radio as either general communications to all amateurs or personal communications indicate that amateurs readily acknowledge these conditions not as an aberration but as a widespread phenomena; in some cases, amateurs freely admit their own shortcomings in that regard without compunction (see Appendix II). The most notable letters come from a schoolteacher, who states "But why ohm's law. Do all hams know ohm's Law? I don't... By the way. These days you can go very far on computer without having to know very much about electricity." Other letters come from an amateur from the midwest involved in the Volunteer Examiner program who is concerned with the memorization of the question pool, and the fact that existing question pools will not be updated for several years! Several other letters indicate that the rote memorized exams are of major concern to many in the amateur community. Another letter from an Extra Class licensee objects bitterly to this petitioner's initial no-code, no-theory proposal, but does not dispute the harm created by a readily available question pool and the negative factors involved in rote memorization.

In summary, while it can be argued that a case can presently be made for a no-code license, a case can also be made for a no-theory license, simply because today's amateur exams do not reflect a need for the amateur to apply electrical theory in general; or, in particular, to apply the theory to the construction or operation of his or her station. Indeed, starting in the early 1980s and proceeding to the present time, the exam structure established by the Commission reflects that notion. As mentioned previously, the traditional exam structure has in fact been abandoned, replaced by one in which the exact questions and answers for all amateur exams are periodically published and available to any amateur or prospective amateur. The standard definition of examination as would be regarded by most educators has thus ceased to be; a no-theory license, in fact, exists now! In addition, financial conditions notwithstanding, amateur examinations are no longer conducted at FCC offices, attesting somewhat to the relative unimportance of amateur licensing in the priorities of the Commission. While it may be argued that an examination of some sort must be undertaken in order to prepare prospective amateurs for understanding the rules and regulations of general operation, one needs only examine the Class D Citizens Band service to invalidate that belief. In summary, individuals participating in the license-free Citizens Band Service well understand the rules and regulations; they simply choose to ignore them. A need for formal testing of rules and regulations without an applicant's commitment to a thorough study of technical principles thus provides no guarantee of competence or compliance in this area. Indeed, despite the existing amateur exam structure, which places a premium on rules and regulations at the expense of technical content, the increase in unlawful operation within the amateur bands has become a national epidemic, and PRB Commission personnel met with ARRL President Wilson last year to discuss solutions. Despite initial Commission actions to curb abuses, including the levying of heavy fines in some cases, the incidence of unlawful operation is still significant.

Lack of a Mission

The argument has been advanced that the future of amateur radio lies in emergency service, to provide invaluable aid in times of local or national disaster. Unfortunately, however, modern technology has placed portable communications equipment in the hands of most every civil

defense, fire, police and emergency-preparedness organization worldwide. Amateur radio's contribution in this regard, especially in light of the typical amateur's inability to repair or build suitable equipment to conduct emergency communications, thus places amateurs in a somewhat redundant position for the service it provides. It should be well noted also that amateurs have yet to establish a nationwide emergency calling frequency, something which those in the Class D Citizens Band Service have had long access to. Thus, amateur radio can no longer uniquely justify its existence under any of the provisions of Part 97.1. First, other private and commercial services can provide emergency service as effectively, or more effectively, than the amateur service. Secondly, amateur radio is no longer promoted as a technical hobby. The exam structure does not encourage excellence and improvement, but rather rote memorization.

Aforementioned evidence has been presented in strong support of the statement that amateur radio is no longer of substantive use to the nation in attracting prospective amateurs to careers in science and technology. Amateur radio is now effectively without a mission, and no longer can challenge those entities who would vie for the frequencies amateurs now occupy. The Commission has argued that no evidence has been presented to justify the aforementioned claim. On the contrary, two bills in the House and Senate, HR-73, and S-1372, respectively, have been initiated to prevent reclaiming of frequencies by the Commission without due compensation. Unfortunately, however, the basis upon which the bills depend are at fault, and will not protect amateurs against a reclaiming of its frequencies. As an example, as the Commission is fully aware, the first acclamation in both bills incorrectly defines amateur radio as a technical hobby. The bills would thus need to be redrafted in order to document the true state of affairs. The only basis upon which amateur radio could survive would be as an aid in technical education, for which it could provide a unique service. The Commission's actions, however, simply do not support that mission.

Counter-Evidence to the FCC Position for Easing of Requirements

No Basis to ARRL/FCC Shrinking Number Theory

Although amateur radio has enjoyed relatively large growth over the years, there unfortunately was a short period in the early 70s, where growth was less than two percent a year. At that time, the low rate of growth was of concern to the ARRL and the FCC. The period passed, but the idea of small growth was not forgotten. On the contrary, during the period of 1982 to 1988, the connection of small growth to loss of frequencies was again resurrected, at various times by both ARRL and FCC, often through the amateur radio press. However, there is no indication that such a general condition ever existed, as indicated in the following table for randomly selected years over 5 decades:

Year	Per Capita/1 ham (approximately)
1939	2549
1952	1356
1965	700
1985	542

Source: QST magazine, Amateur Radio Callbook

In short, the U.S. amateur population grew at a rate 5 times faster than the general population

over the years 1939-1985. Thus, there is no evidence to support the contention of any entity that a "shortfall in growth" of amateurs ever existed, independent of the changes in method over the years that have been used to gauge the amateur population. The use of such statements, which proliferated in the amateur journals from various sources, presumably to gain amateur acquiescence for the "no-code" license, had no basis in fact.

No Basis for Claims of Amateur Support

The Commission, through PRB Chief John Johnston, cited "changing amateur sentiment" as the basis for passing the no-code proposal in 1989. Unfortunately, *no scientifically conducted poll of any kind was ever conducted by the FCC, the ARRL, or any entity in the amateur radio press to support the FCC contention of "changing amateur sentiment."* Indeed, the evidence indicates that ARRL members did not have a choice of whether to accept the no-code license proposal, *but rather a choice of the conditions under which a no-code license would be acceptable to amateurs* (see QST, September 1989, page 56, Minute 39). In that context, it should also be stressed that only 25 percent of all hams are members of the ARRL; even as the largest nationally organized group of amateurs, they do not necessarily represent the wishes of all hams or even its own membership (see last letter in Appendix II, which although not elegantly stated, represents one underlying belief of the amateur community). In addition, the NARA organization, a group of radio amateurs claiming upwards of 5,000 members in 1989, had been cited as one entity representative of amateur sentiment regarding the passage of the no-code proposal. However, the FCC did not request, and did not receive, any documentation to substantiate the claims of NARA's membership size. The results of an initial investigation conducted by this petitioner indicates that the NARA group at the time of their filing for support of the no-code license numbered approximately 10 to 15 amateurs, no more than that.

FCC and the Americans with Disabilities Act

During the last two years, the Commission cited possible law suits related to the Americans with Disabilities Act with regard to granting a waiver of Morse Code requirements to the handicapped, despite evidence to indicate any Court would uphold a class-action suit from the handicapped on this matter. Furthermore, from a legal standpoint, the FCC complicated the issue, and unfortunately compromised the integrity of the amateur service in doing so, through a series of inconsistent actions immediately following their initial decision (see Appendix III).

Final Comments and Conclusion

The Commission, denied a June 2, 1992 petition for a no-code, no-theory license and a request to clearly define its position on the future of the amateur radio service, on grounds that the petitioner had not shown evidence of various conditions as related to the state of amateur radio. The petitioner has thus provided evidence herewith, and in bulk, to meet the Commission's requirements for supporting information. Indeed, the evidence is strong that Commission actions over the past decade have weakened the ability of the radio amateur service to justify their frequencies as a technical hobby, especially in view of the fact that more than 100 MHz of frequency allocations have been reclaimed (see Amateur Radio Spectrum Protection Act) despite a five-fold increase in the per-capita population of radio amateurs over a 50-year period.

In summary, the evidence clearly indicates that the Commission:

(a) Abandoned in de-facto fashion the principles of the ARRL/FCC "Incentive Licensing" Program to restore technical competence for the Amateur Service Program, shortly after it was adopted.

(b) Did not object to the development of rote-memorization exams over a 20-year period, which essentially has created a no-theory license structure.

(c) Spearheaded the no-code movement

(d) Tied amateur's acceptance of the no-code license with retention of their frequencies in the VHF portion of the spectrum; and further, reclaimed part of one VHF band.

(e) Established the no-code license for VHF frequency privileges without demonstrated amateur support, despite Commission contention of "changing amateur sentiment," later extending a no-code waiver to the handicapped under the convenience of the Americans with Disabilities Act.

The evidence presented also strongly supports the view that a no-theory license exists for all practical purposes, and that a no-code license is a strong possibility for all classes of license in the future. While such decision is the Commission's to make, the facts indicate that such actions have weakened the ability of the Amateur Service to justify its frequencies as a technical hobby under the guidelines established in Part 97.1 of the Communications Act. More specifically, the loss of more than 100 MHz of amateur frequencies during the last decade and the filing of the Amateur Radio Spectrum Protection Act (S-1372, HR-73) on behalf of radio amateurs indicate that the Amateur Service is no longer held in the same high regard it once was.

To survive, amateur radio must be able to meet clearly understood criteria set by the Commission; otherwise, we cannot justify the frequencies we now occupy. Again, more than 100 MHz of frequency previously allocated to amateurs have already been lost in the last decade (ibid., S-1372 Amateur Radio Spectrum Protection Act by sponsor Gore, HR-73 by Cooper). The reclaiming of these frequencies, despite a five fold increase in the amateur population with respect to the general population over the last 50 years, provides significant indication of amateur radio's lack of worth to the Commission under the existing provisions of Part 97.1 of the "Amateur Charter." It thus appears appropriate for the Commission to establish clearly stated conditions for the amateur radio service it *can* meet, in order that the Service survive intact with the frequencies presently allocated. Since actions taken by the Commission in the last two decades have made it clear that a return to a technically based amateur radio is, for whatever reasons, unwanted, then a further easing of regulations to allow increasing numbers into the hobby and markets to grow, with a new mission as set by the Commission, would appear a necessary condition for amateur radio's prosperity.

A no-theory exam structure, i.e., rote memorization exams, now exists for all practical purposes. Recent provisions of a law for the handicapped passed by Congress and supported by the Federal Communications Commission has also eased Morse Code requirements for that segment of the population. Furthermore, judicial support for a no-theory license for the handicapped, and by extension, to the general population, would thus appear to be likely and inevitable in any case because of legal inconsistencies in FCC decision-making during the past two years (see Appendix

III). In the absence of a return to meaningful technical standards, formal declaration of a 5-wpm, no-theory license for all frequencies allocated to the high-frequency spectrum, graduating to a no-code, no-theory license once the agreements of international law can be modified regarding the code requirement, would therefore appear to be in the best interests of the amateur radio service. At the least, clear declaration by the Commission of the hobby's modern purposes and goals would be reasonable and proper, and would offer amateurs, through *compliance* with a clearly and meaningfully stated Part 97.1, a tangible degree of protection against further encroachment of its present frequency allocations.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Scott Leyshon', with a long horizontal flourish extending to the right.

Scott Leyshon, WA2EQF

P.O. Box 387

Chester, NJ 07930

April 12, 1993

APPENDIX I

143 Pleasant Grove Rd.
Long Valley, NJ 07853
25 January 1993

Mr. Scott Leyshon
PO Box 387
Chester, NJ 07930

Dear Scott,

Further to your letter of 27 December regarding a previous survey I conducted on radio amateurs' knowledge of basic electricity, I am unable to provide you with the original "exams," that information having long been discarded. However, I have kept the recorded results, supplied herewith. I should add that it was not an exam at all, simply a "just for fun" one-question exercise that 205 amateurs participated in at local hamfests during the summer of 1986. Regrettably, the vast majority of amateurs failed. The "test" was open to all amateurs regardless of age, but from my recollection the vast majority that took part were teenagers or younger. To encourage participation, no personal information was asked of the participants other than their license class.

Question:

What is voltage?

- (a) The work needed to move an electric charge from one point to another in an electric field.
- (b) The force needed to push one coulomb of electrons through a resistance of one ohm.
- (c) The pressure needed to force one coulomb of current through a resistance of one ohm.
- (d) The electromotive force, or electrical pressure, required to drive one coulomb of charge through a resistance of one ohm.
- (e) None of the above.

The correct answer, of course, is (a), which is the most general answer. Voltage is a unit of work, or more properly, the work per unit charge.

RESULTS

The following table outlines the breakdown for grading:

Class	# Participated	# Correct Answer
Extra	13	5
Advanced	38	4
General	62	5
Technician	54	9
Novice	38	3
Total	205	26

To summarize, 26 of 205 participants, or 12.9 percent, correctly defined the meaning of voltage. To reiterate, this was a "just for fun" exercise

and was not intended to be any more than that, nor could it be from a statistical standpoint. However, although the question as asked required some thought to answer, it does initially appear to me there is a rather serious deficiency when it comes to amateurs' understanding of even the most fundamental aspects of electricity, and it should be looked into further. Unfortunately, too few are concerned enough with the educational system to do anything about it at this time.

In that connection, I again wish to register my disapproval of the petition you filed last June with the FCC for a no-code, no-theory license, and request that you refrain from any further petitioning. While I don't disagree with your general position (just your solution), and I certainly would have to agree that the Commission appears to have a hidden agenda, or rather, hidden goals, I would caution that proposals such as yours are simply more fuel for the fire.

I have provided you with the results of my "survey" so that you understand the alarming state of affairs in amateur radio; further deregulation is the last thing we need. I have closely followed the dynamics of the FCC-amateur radio-industry relationship for many years, and it is my opinion the Personal Radio Branch will simply take all future petitions calling for deregulation, store them away, and drag them out when they deem it appropriate to deregulate further. As you undoubtedly know, several individuals in the Personal Radio Branch have been entrenched in the bureaucracy for a long time, and have been instrumental in the latest round of deregulation, perhaps per their own goals for amateur radio, and perhaps to establish a reason to re-assign some of our frequencies to commercial interests. Unfortunately, the Commissioners of the FCC know little about amateur radio and take the comments of the PRB as gospel. Your petition will simply work against amateur radio in the long run and hasten its demise. Therefore, be advised that any future petitions you may file with the Commission will be met by many counterproposals from concerned amateurs to restore standards in this hobby. If that means bringing Congress into the picture above and beyond their present involvement with the Spectrum Protection Act, then so be it.

Very truly yours,



Vincent Biancomano
WB2EZG

APPENDIX II

17014 PN 2085 WA2EQF N2MRB 920223

Forwarding path: N2IMC WA2SNA W2JUP KC2FD

Hi Scott

I never said only operating procedures. I would like to keep knowledge of safety part 97 size of bands, privs. But why ohms law. Do all hams know ohms law. I don't. If I need to know such things for putting together ants or mounting radios then I will follow instructions. I do not agree with a test that is based solely on memorization. Scott, tests can always be made harder and tests can always be made easier. Take it from me; I am a high school teacher in New York City. I have done both. Where do we draw the line. If the test gets real hard the way some guys want, then the theory part as well as the code part will become so hard that ham radio will become an elitist group. I am totally against that. More than likely, only people like ees or electricians would come close to passing these tests. As it is I find as you know the General extremely hard. I don't even want to look at it. Yet, I think I make a pretty good a dedicated ham. One day I will get those 5wpm and be on my way. However, I was told that the January qst mag has an article about doing away with t code for hf. I have

More? (Y, n, c) y

not heard about theory being tossed. Back to tests. As you know packet is really blooming. Maybe spelling tests should be given. Maybe typing tests should be given. Does it end. You can add and add and add. But does it make that person a better more dedicated ham? I truly doubt that. Test yes, but

don't test for the sake of testing, and don't test to discourage people from joining. Get back to me. I am enjoying this discourse immensely. I have a feeling others will join in. 73

By the way. These days you can go very far on computer without having to know very much about electricity.

Harvey n2mrb @kc2fd.ny

*** END OF MSG # 17014 from N2MRB @ KC2FD.#NLI.NY.USA.NA

Enter command: A,B,C,D,G,H,I,J,K,L,M,P,R,S,T,U,V,W,X,?,* >

km

MSG 17014 Killed

Enter command: A,B,C,D,G,H,I,J,K,L,M,P,R,S,T,U,V,W,X,?,*>

APPENDIX II (continued)

APPENDIX II

*** END OF MSG # 29831 from N8OFS @ N8BM.#NEOH.OH.USA.NA

Enter command: A,B,C,D,G,H,I,J,K,L,M,N,P,R,S,T,U,V,W,X,?,* >

r 29831

MSG #	TR	SIZE	TO	FROM	@BBS	DATE	TITLE
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29831	B#	1915	ALLUS	N8OFS	ALLUSA	920803	ARRL (WHAT A BUNCH OF LOOSERS)
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Forwarding path: W2ODV N2IMC KB2NEX KB2LPW WA2JVM W2NRE KA2MSL WA2PVV

WB2WXQ N2CVQ VE3SNP KA3SFC NM3G KA3OEM W3IXR W8SP WB8CQV KA8DRR WA8GUG

MSG #	TR	SIZE	TO	FROM	@BBS	DATE	TITLE
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29840	B#	1495	DEBATE	AA2HM	ALLUSA	920803	Ref: no theory
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Forwarding path: W2ODV N2IMC KB2NEX KB2LPW WA2JVM W2NRE KA2MSL WA2PVV

N2LSS

Greetings to all, after reading a few bulletins pertaining to a "proposed no theory licence" I would say don't worry, it won't happen, at least I hope not.

Now when you consider the written exam pool with exact answers, and people just memorizing the answers to pass the test, but at least they do have to read the pool, and are exposed to the rules, regs, and theory and consequently to learn something. I must agree that a NO THEORY lic would in deed be a total disaster.

We are close to no theory now, with memoriized pools, one only needs to listen on the local repeater to see how little theory these new hams possess. I quess thats where we come in to play, its called elmering, someone helped us, we pass ssssit along. 73 to all.

DE Keith, AA2HM@N2LSS.WNY.USA.NA

*** END OF MSG # 29840 from AA2HM @ N2LSS.#WNV.NY.USA.NA

Enter command: A,B,C,D,G,H,I,J,K,L,M,N,P,R,S,T,U,V,W,X,?,* >

r 29841

MSG #	TR	SIZE	TO	FROM	@BBS	DATE	TITLE
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29841	B#	3290	DEBATE	WQ1F	ALLUSA	920803	Now it's No theory?
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Forwarding path: W2ODV N2IMC KB2NEX KB2LPW WA2JVM W2NRE KA2MSL WA2PVV
WA2UMX WA2TVE KB2HKI WB2WXQ N2CVQ VE3SNP VE3DY VE3CDY VE3IWJ VE3NAV
VE2FKB VE2CEV VE2CRL VE2CSC WA2SPL KD2AJ

Well, I suppose we all should have expected it. First it was
NO CODE and now its NO THEORY.

Yes, that's right we have a proposal that would make all of amateur
radio a citizen's band.

I have in the not too recent past have been crtical of the amateur
exams as they currently exist. In particular the exact questions
including those that require the application of some simple mathematics,
published verbatim. This was never true in the days that the FCC gave
the examinations!

However, I think to further relax qualifications is calling for a
disaster, the over night demise of amateur radio.

For some the removal of the code for the technician class was a mistake,
well after listening to one of our local repeaters, I found kids of 11
grandmothers, wives of long licensed OMs all with NOCODE tickets and
More? (Y,n,c) y

signing their calls,being curteous, no use of idiot CB double talk,
no monopolization of the various machines, and in general behaving
like sane and respectful people who now enjoy our hobby.

From this empirical observation I concluded that NOCODE was not a disaster
and in fact many are actively studying CW so they can soon upgrade.

However, we face an entirely different situation with NO THEORY.

These people would not even have to exhibit knowledge of operating
frequencies!

We'll let's call it what it is, another attempt by CB radio manufacturers
to sell more expensive radios to everyone.

If I am still here they day NO THEORY is a reality, my license goes up
like a torch. QRTSVILLE BABY!

73 Gary WQ1F

*** END OF MSG # 29841 from WQ1F @ KD2AJ.#NNY.NY.USA.NA

Enter command: A,B,C,D,G,H,I,J,K,L,M,N,P,R,S,T,U,V,W,X,?,* >

APPENDIX II (continued)

Normally, I don't respond to ridiculous msg's on packet but this one totally a

Normally, I don't respond to ridiculous msg's on packet but this one totally a

Subject: No-Theory License Rebuttal

Path: WA2SNA!K2ZM

Normally, I don't respond to ridiculous msg's on packet but this one totally annoyed me. It is obvious this proposal was based solely on selfish reasons, ignorance of ITU standards, Technical illiteracy, uninformedness of Bulletins, and isolationism.

It is blatantly obvious that the author of this proposal has self-serving motives, namely he is a Technician & has been one for over 20 years and wants all for nothing.

In the matter of electrical theory, we as amateurs ARE expected to apply electrical theory in the PROPER operating of our station. Knowledge is needed in constructing antennas, proper grounding, solving interference problems, repairs, etc. Lack of this knowledge could kill someone or will mean grief for the operator or public.

I beg to differ in the matter of becoming technically competent.

I am a 28 yr old single female who has an EXTRA class license.

I had no help in obtaining my licenses. I am proud that because

I had to take the all of the exams, I now know about propagation,

antenna designs, circuitry, etc. I have built kits and all of my

antennas for HF & VHF operations. I have made simple repairs on my

equipment. None of which would have been possible had I not taken

Perhaps a conversation with school teachers who have been successful in having amateur radio as part of the curriculum or a afterschool program will radical change your mind on young amateurs choosing careers in the sciences as a direct result of there exposure to amateur radio.

I will agree that the question pool should not be readily available. I will also admit that although I read all of the manuals and some several times over, I did rote memorize the answers. But nonetheless, I still learned alot from it.

In the matter of "Lack of a Mission", I'm glad to see that you don't have a mission because as a Assistant Emergency Coordinator, Radio Officer for my city, Net Manager for ARES/RACES, Net Manager for a traffic net, I do. Again, it is very obvious that you are not involved in ARES, RACES, or anything else for that matter. If you were involved, you would know that we play a key role. Emergency services may have there own communications frequency but they don't have one mutual frequency where Red Cross, Salvation Army, Fedearl & state agencies, police, fire, evactuation centers, schools, etc. can use and that's where we earn our key.

Although we may not have a national calling, frequency, I have yet to hear of someone on HF who was unable to obtain help when needed. Frequently, rescue stories are reported in the amateur media as a direct result amateur radio.

In the matter of those who willfully voilate part 97, had you been keeping abreast the of the latest news, you would have know that the FCC recently was granted permission to levy heavier fines of which they have been taking advantage of. It has been the headlines of several "ARRL Letter" Additionally, the FCC is working on this.

In addition to the above, a no theory, or shall I say, a no license, license is wrought with many potential problems that presently exist on CB. I suspect & hope that this proposal hits the garbage can & we amateurs don't needlessly waste the FCC's time & money by unfactual, ludicrous, proposals of this nature.

Darlana D. Mayo KB2EPU/ORS/OES/OBS

Assistant Emergency Coordinator

RACES Officer

Net Manager

Done!

New Providence ARC >

APPENDIX II (continued)

Hello Scott. Let me congratulate you on your proposal for the establishment of a no-theory Amateur Licence of June 02, 1992. I have to be honest with you that I do not think such a proposal will "fly" however, but ONLY for the reason that ham's are allowed to use a VFO-type transmitter. No other service is allowed this luxury, and I feel that this is the ONLY reason a No-Theory Licence will not be adopted. The only way I see one going thru is if all our bands were "channelized", for reasons of interference & control. I must congratulate you however for putting forth one of the most complete descriptions sss

of the past, present & possible future of this hobby that I have read since I was first licenced 16 years ago. You are SO CORRECT when you state the lack of a specific Mission for this hobby. We have ceased to be a vanguard for technical development YEARS ago, and to say that we have justification for continued occupance of our frequencies by outdated "traffic handling" and such is so inane as to be a real strain on reality. I hear so much of "this great historic service" at club meetings that it makes me SICK. I have worked with laser/fibre technology capable of sending a complete text of the Encylopedia Britanica across the USA in about 30 seconds, and what do they do...

..sit & bitch over "no code", or "deregulation" of the "service"..UNBELIEVABLE!

Oh well Scott, if anything, your proposal has, and is in the process of sounding a LONG NEEDED wake-up call to the ham population that it's 1992, not 1932. Again, I do not see a no-theory Licence (ad least not today...) in the future, but, again, you are to be congratulated for putting to ink, probably the best & ACCURATE description of the present status of this hobby, here, today, in 1992. Thanks again, and If I see you at a hamfest, the burger & Pepsi is on me!

George wa2rcb@n3foa.#ea.pa.usa.na (.*.*)

....Truth, is always fancier than fiction. (spoken by noneother than CURLEY HOWARD of Three Stooges fame in that episode where they act-out the Curt Robbins case...the one where Curley plays the Bass-Fiddle on the Court Bench.)

APPENDIX II (continued)

MSG #	TR	SIZE	TO	FROM	@BBS	DATE	TITLE
29896	B#	1511	ALL	KB2CPW	ALLUSA	920804	NO THEORY A REALITY ALREADY, WAKE UP! !!!!

Forwarding path: W2ODV

WHATS ALL OF THE FUSS?? NO THEORY IS A REALITY PEOPLE!! IT SEEMS THAT THE FCC AND THE ARRL PULLED ANOTHER OUT FROM UNDERNEATH US. 902-928 MHZ HAS BEEN GIVEN TO THE PHONE MONGERS AND WEEKEND ATVERS. IF YOU LOOK IN THE PAPERS 900 MHZ CORDLESS PHONES ARE ON THE SCENE, AND SO ARE TV TRANSMITTERS. I DONT CARE HOW LITTLE THE POWER OUTPUTS ARE, IF MY NEIGHBOR HAS ONE, HE WILL BE MIGHTY MAD WHEN MY ATV GEAR WACKS OUT HIS PHONE!! GEE I WONDER WHY THE BIG THREE NEVER MADE GEAR FOR THIS VALUABLE BAND?? MAYBE THEY HAD FORE SIGHT?? OR AN INSIDE TIPOFF?? OR MAYBE THEY PLAN ON MAKING PHONES. MARK MY WORDS PEOPLE, WE WILL LOSE THIS ONE TOO. I DONT PLACE THE BLAME ON ANYONE IN PARTICULAR, BUT I CAN SAY THIS, GOD HELP US... PLEASE SEND US SOMEONE WITH THE ABILITY TO PROTECT OUR SPECTRUM. IT SEEMS OTHERS HAD TRIED OR LIED AND FAILED US AGAIN. ALLTHOUGH WE CAN "SHARE" THIS SPECTRUM WITH OTHER SERVICES, WHY SHOULD WE. THIS BAND PROVIDES INPUTS AND OUTPUTS FOR MANY ATV REPEATERS THROUGHOUT THE USA. YOU MAY NOT USE THE BAND BUT KEEP IN MIND, THE NEXT BAND MAY BE THE ONE YOU FREQUENT!! WHY WASNT THIS ISSUE BROUGHT TO OUR ATTENTION??

APPENDIX II (continued)

From: KC9C @ WA6NWE.#NOCAL.CA.USA

To: ALL @ USA

Date: 920129/0637

Mgid: BF 10155@WA6NWE, 42022@KA2UGQ #10155_WA6NWE

Subject: VECs failed? UPDATE:

Path: K2KJC!WB2IBD!N2DSY!KB1BD!K2ADJ!K2ADJ!KF2AW!KA3FMO!KB4UAH!W7LUS!KB4FO!WB4TEM!KB4VOL!KB4DAM!WA6NWE

After my last message entitled "FCC/VECs have failed us!" I received a letter from Bart Jahnke at the ARRL. Bart is magager of the Question Pool Committee QPC. He explained that the QPC IS doing something about the outdated Technician question pool. He sent me a copy of the schedule, which appeared in Sept QST. In part, the schedule is:

Solicit public input:	Feb 1, 1992 - June 30, 1992
QPC to begin	July 1, 1992
New question pool	July 1, 1993

In other words, the well-planned schedule, approved by the National VEC Convention last June, calls for the question pool to reflect the no-code technician (and novice 80m band change)...IN A YEAR AND A HALF FROM NOW!

Most of the responses I recieved were as astonished as I was that a year had passed without the question pool being updated (since the no-code went into effect 2/14/91). Now, I learn that the pool won't be updated until TWO AND A HALF YEARS after the no code's effectivity!

This just isn't responsive! Something is drastically wrong with a system that requires 2 1/2 years to update questions to reflect reality.

Bart also says that the question pool "is not intended to be a complete

compendium of amateur radio knowledge." This is great theory, but any of you who have worked with new ham licensees know that the majority DO INDEED study exclusively from the question pool... Let me rephrase that: they MEMORIZE the question pool. The QPC thinking otherwise is a head-in-the-sand attitude.

The VE program is the single best thing to happen to Ham radio in the 17 years I've been licensed. But, with schedules like this, it won't be too long before all the pools are uselessly out-of-date (other pools' revisions will FOLLOW the revision of the Novice and Technician).

If you believe, like I do, that this current revision system is not in the best interest of hams or the general public, PLEASE write to Bart and/or David Sumner at: ARRL, 225 Main St., Newington CT 06111.

The VE program is too good a thing to let go down the tubes because the questions are not current.

73, Mark KC9C @ KG6XX

message-ID: <020036WT3V>

APPENDIX II (continued)

Reply-To: n2gyn@wt3v.nj.usa

To: @usbbs

Subject: GEEK III THE COVER UP

TO ALL PACKET GEEKS AND FRIENDS ALIKE. THANK YOU FOR YOUR TREMENDOUS RESPONSE AND ENCOURAGEMENT THAT MANY OF YOU HAVE SHOWN. I AM SORRY I AM UNABLE TO RESPOND TO ALL OF YOU INDIVIDUALLY BUT WOULD LIKE TO EXPRESS MY APPRECIATION FOR YOUR RESPONSES.

THIS MESSAGE IS TO DISCUSS THE ONGOING TOPIC OF THE DESTRUCTION OF HAM RADIO. IT IS GETTING MORE AND MORE DIFFICULT TO SEND OUT ANY OF MY MESSAGES, AS THE GEEK SYSOPS HAVE ATTEMPTED TO JOIN FORCES TO LOCK ME OUT OF ALL BBS'S ON THE EAST COAST FOR MERELY VOICING MY OPINION ON THE NO CODE LICENSING.

More? (Y,n,c) y

ONTO A NEW SUBJECT:

THE LEAGUE AND ITS INFINITE PLAN TO DOMINATE AND DESTROY HAM RADIO.....
DONT LET ANYONE TRY TO CONVINCE YOU THAT THE ARRL IS ONLY FOR THE GOOD OF HAMS. THIS IS A HAM RADIO CLUB THAT HAS GONE AMUCK. THEY CLAIM TO SUPPORT AND REPRESENT ALL HAMS BUT ONLY SUPPORT AND AND REPRESENT THEIR OWN CRITERIA. DARE I MENTION THE FACT OF SUPPOSEDLY BEING A NON PROFIT ORGANIZATION? THEY HAVE DONE NOTHING TO HELP OUR HOBBY OR TO SUPPORT AND PRESERVE THE PRIDE AND FEELING OF BEING PROUD TO BE A HAM. WE ARE NO LONGER A PART OF A ELITE SELECTION OF PEOPLE WHO HAVE A SPECIAL SKILL. THEIR INFINITE PLAN IS TO HAVE A HAM RADIO IN EVERY GARAGE IN THE USA. EVERYTIME YOU SUBSCRIBE TO THEIR PUBLICATION YOU ARE NOT MERELY SUBSCRIBING TO RECEIVE A MAGAZINE BUT YOU ARE MERELY ADDED, LIKE A FEATHER IN THEIR CAP, TO THEIR NUMBERS, TO SHOW THAT THEY REPRESENT YOU AS A HAM OPERATOR TO WASHINGTON DC. EVEN THOUGH YOU MAY COMPLETELY DISAGREE WITH THEM LOBBYING THEIR OPINIONS YOUR NUMBER IS ADDED